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April 24, 2023

VIA ECF

Honorable Michael A. Hammer, U.S.M.J.
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: *Veronica Doe v. Rutgers University, et al.*
Civil Action No. 21-20763 (EP) (MAH)

Dear Judge Hammer:

Our firm represents Defendants in this matter. As a result of an agreement reached between the parties, we write to respectfully request a modification of the March 6, 2023 Amended Scheduling Order (ECF No. 63). Although an Order was entered on March 28, 2023 (ECF No. 66) partially amending the March 6, 2023 Scheduling Order, this request does not affect the March 28, 2023 Order.

Paragraph 4 of the Amended Scheduling Order (ECF No. 63) currently provides: "All responding expert reports shall be delivered by **April 28, 2023**." (Emphasis in original). We respectfully request that the April 28, 2023 deadline for Defendants to submit any expert report in rebuttal to the affirmative report of Plaintiff's liability expert, S. Daniel Carter, be extended by two weeks, through and including May 12, 2023. Plaintiff has consented to this request.

Good cause exists for the requested extension. Specifically, the additional time will enable Defendants' expert to complete the report notwithstanding other existing professional obligations, including substantial out-of-state business travel commitments commencing later this week. Additionally, Plaintiff's liability expert recently supplemented his expert report on April 21, 2023 and additional time is needed for Defendants' expert to review and respond to the supplemental report.

If Your Honor is amenable to the foregoing, we respectfully request the Court execute the So Ordered provision below and have its Order filed with the Clerk of Court.

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We thank the Court for its consideration and assistance. Naturally, if the Court has any questions, we are available to respond at the Court's convenience.

Respectfully submitted,

s/ Sean R. Kelly

SEAN R. KELLY

cc: Counsel of Record (via ECF)

SO ORDERED

s/Michael A. Hammer

Michael A. Hammer, U.S.M.J.

Date: 4/24/2023